



1 BARRY J. PORTMAN
2 Federal Public Defender
3 ANGELA M. HANSEN
Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
San Jose, CA 95113
4 Telephone: (408) 291-7753

5 Counsel for Defendant HEINZ

6

7 IN THE UNITED STATES DISTRICT COURT
8
FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,) No. CR 06-00281 JW (PVT)
11)
12 Plaintiff,) STIPULATION AND [PROPOSED]
vs.) ORDER TO CONTINUE HEARING
13) DATE
14 STEVEN HEINZ,)
15 Defendant.)

16 Assistant United States Attorney Jeffrey Nedrow and defendant, Steven Michael Heinz,
17 through his counsel, Assistant Federal Public Defender Angela M. Hansen, stipulate and agree
18 that the date set for a status hearing, May 22, 2006 at 1:30 p.m., should be continued to June 26,
19 2006, at 1:30 p.m.

20 Mr. Heinz cooperated with the government's investigation and government counsel is
21 currently deciding on the terms of the plea agreement for Mr. Heinz. The parties stipulate and
22 agree that the May 22, 2006 date should be continued because the parties need additional time to
23 negotiate a disposition, and, once government counsel provides a plea agreement, counsel for Mr.
24 Heinz will need additional time to discuss the agreement with her client. The parties further
25 stipulate and agree that under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv), the ends of justice served
26 by the continuance requested outweigh the best interest of the defendant and public in a speedy
trial because the failure to grant such a continuance would deny the defense the time necessary

1 for effective preparation, taking into account the exercise of due diligence.

2

3

Dated: May 19, 2006

4

5

6

Dated: May 19, 2006

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

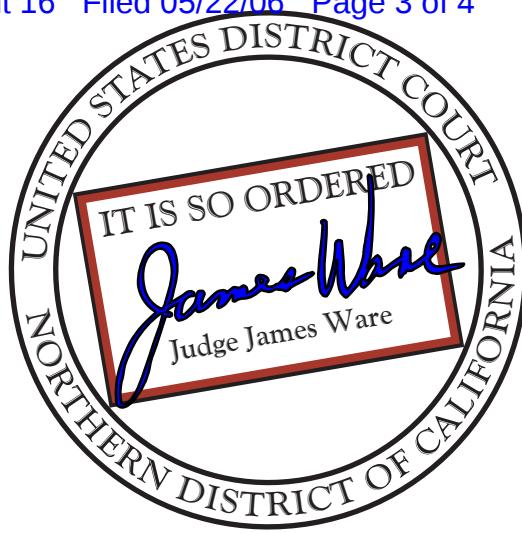
24

25

26

/S/
ANGELA M. HANSEN
Assistant Federal Public Defender

/S/
JEFFREY NEDROW
Assistant United States Attorney

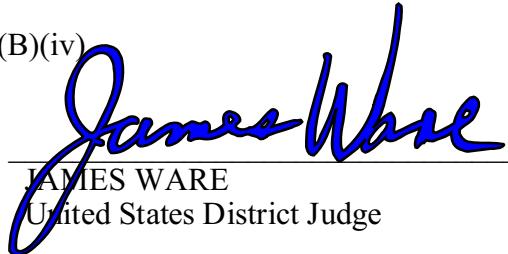


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) No. CR 06-00281 JW (PVT)
vs.)
STEVEN HEINZ,)
Defendant.)

The parties have jointly requested to continue the status hearing, IT IS HEREBY ORDERED that the date presently set for status hearing, May 22, 2006, is continued to June 26, 2006 at 1:30 p.m. IT IS FURTHER ORDERED that the period of time from May 22 to June 26, 2006, shall be excluded from the period of time within which trial must commence under the Speedy Trial Act, 18 U.S.C §§ 3161(h)(8)(A) and (B)(iv).

Dated: May 22, 2006


JAMES WARE
United States District Judge

1 Distribute to:

2
3 Angela M. Hansen
Assistant Federal Public Defender
160 West Santa Clara Street, Suite 575
4 San Jose, CA 95113
Counsel for Defendant

5 Jeffrey Nedrow
6 Assistant United States Attorney
150 Almaden Blvd., Suite 900
7 San Jose, CA 95113
Counsel for the United States

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26